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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047
MDL No. 3047

This Document Relates to:
ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER GOVERNING PLAINTIFFS'
RESPONSES TO DEFENDANTS' FIRST
SET OF REQUESTS FOR
PRODUCTION NOS. 32, 33, 34, AND 66**

On August 8, 2024, the Court heard argument on the Parties' Joint Letter Brief Regarding Plaintiffs' Responses to Defendants' Requests for Production (ECF No. 1051). The Court hereby ORDERS as follows:

Plaintiffs shall produce documents responsive to the following requests, limited to the Relevant Time Period, as defined in Defendants' First Set of Requests for Production:

32. All DOCUMENTS RELATING TO any criminal investigation or proceeding involving YOU or YOUR biological parent, step-parent, legal guardian, or anyone with whom YOU resided, either part-time or full-time, during the Relevant Time Period, as a suspect, defendant, respondent, victim, complainant, and/or witness, INCLUDING police records, sworn statements, juvenile justice records, criminal justice records, arrest records, court proceedings, transcripts, conviction records, sentencing records, bail records, and supervision records.

1 33. All DOCUMENTS RELATING TO any civil family court, juvenile court,
 2 neglect, truancy, divorce, or foreclosure proceeding or investigation involving YOU or
 3 YOUR biological parent, step-parent, legal guardian, or anyone with whom YOU resided,
 either part-time or full-time, during the RELEVANT TIME PERIOD, INCLUDING any
 prior sworn testimony by YOU.

4 34. All DOCUMENTS RELATING TO any interaction with child protective
 5 services, child and family services, foster care, adoption, or any other similar child welfare
 agency or organization RELATING TO YOU or YOUR biological parent, step-parent, legal
 6 guardian, or anyone with whom YOU resided, either part-time or full-time, during the
 Relevant Time Period.

7 66. All DOCUMENTS RELATING TO any break ups that (1) YOU have
 8 experienced with a boyfriend, girlfriend, significant other, or other romantic partner, with
 whom you were in a relationship of six months or longer, or (2) YOU discussed with a
 9 medical or mental health provider.

10 In response to these Requests for Production, Plaintiffs shall produce Known Responsive
 11 Documents pursuant to Paragraph 7 of the Order Governing Production of Electronically Stored
 12 Information and Hard Copy Documents and shall run search terms, to be agreed by the Parties,
 13 across the custodial sources from which documents are being produced for the remaining
 14 Requests, including Routine Devices as defined in Discovery Management Order 8.

15 By Wednesday, August 14, 2024, Plaintiffs shall inform Defendants which bellwether
 16 Plaintiffs were involved in breakups resulting from relationships that meet the criteria of revised
 17 Request No. 66 set out above, so that case-specific search terms can be crafted.

19 Dated: August 12, 2024

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ATTESTATION

I, Gregory L. Halperin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 12, 2024

/s/ Gregory L. Halperin

Gregory L. Halperin